

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:

Ramon A. Suarez  
Norma I. Suarez

Debtor(s)

Case No.: 16-26032 / CMG

Hearing Date: July 19, 2017

Chapter: 13

Judge: Christine M. Gravelle

**MOTION FOR ENTRY OF ORDER GRANTING THE *MOTION FOR ENTRY OF ORDER***  
**DECLARING THE AUTOMATIC STAY TERMINATED AS UNOPPOSED**

(Related Docket No. 23)

TO THE HONORABLE COURT:

COMES NOW secured creditor Scotiabank Puerto Rico (“Scotiabank”), through its undersigned counsel, and respectfully states and prays as follows:

1. On June 7, 2017, Scotiabank filed a *Motion for Entry of Order Declaring the Automatic Stay Terminated* (the “*Motion for Entry of Order*”, Docket No. 23)

2. D.N.J. LBR 9013-2 states that “[a]ny (i) opposition to a motion or (ii) cross-motion must be filed and served not later than 7 days before the hearing date.”

3. The *Motion for Entry of Order* stated that if a timely opposition was filed, a hearing would be held on July 19, 2017. See the *Notice of Motion*, Docket No. 23. Therefore, the seven days lapsed on July 12, 2017.

4. To this day, the *Motion for Entry of Order* is unopposed.

WHEREFORE, Scotiabank respectfully requests the Court to enter an order granting the *Motion for Entry of Order* as unopposed. A proposed order was filed at Docket No. 23-3 in compliance with D.N.J. LBR 9013-1(a)(4).

Dated: July 17, 2017  
Westfield, NJ

By: /s/Jean-Marc Zimmerman  
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